

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

CHRISTOPHER ROMANO

NO. 17-11765 ELF

CHAPTER 13

HEARING: November 21, 2017

MOTION OF CAB EAST, LLC/ FORD MOTOR CREDIT COMPANY, LLC FOR RELIEF
FROM THE AUTOMATIC STAY, BANKRUPTCY CODES §§ 362a/1301, RE: A
LEASED 2016 FORD ESCAPE MOTOR VEHICLE

1. Movant is CAB East, LLC/Ford Motor Credit Company, LLC ("Ford Credit") with offices at the National Bankruptcy Service Center in Colorado Spring, Colorado.

2. Respondents are Debtor, Christopher Romano and Non-Debtor, Mindy Romano, and the Chapter 13 Trustee, William C. Miller, Esquire.

3. On or about November 28, 2015, Debtor, Christopher Romano and Non-Debtor, Mindy Romano, leased a 2016 Ford Escape motor vehicle ("Vehicle") pursuant to a 36 month Motor Vehicle Lease Agreement. A copy of the Lease further identifying the Vehicle is attached as Exhibit "A".

4. Pursuant to the Lease, Ford Credit is the owner and lessor of the Vehicle.

5. The Vehicle may be now, to Ford Credit's knowledge, uninsured or improperly insured, not having coverage required by the Lease.

6. Ford Credit has incurred legal expenses in protecting its interests and is seeking adequate protection of its interests which Debtor has failed to provide.

7. There are 15 regular payments remaining on the Lease which is contractually due for August 28, 2017, and thereafter. Regular monthly payment on the Lease is \$244.45.

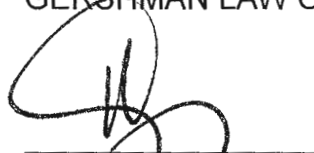
8. The Vehicle is a depreciating asset and unless the matter is immediately resolved Ford Credit will continue to suffer irreparable harm.

9. There is no equity in the Vehicle or the Lease for Debtor or its estate, nor is the same necessary for an effective reorganization.

WHEREFORE, CAB East, LLC/Ford Motor Credit Company, LLC prays this Honorable Court to enter an Order granting it relief from the automatic stay and for such other relief as is just and equitable.

Respectfully submitted,

GERSHMAN LAW OFFICES, PC

A handwritten signature in black ink, appearing to be 'H. Gershman', written over a horizontal line.

Howard Gershman
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